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May 6, 2016

BY ECF

The Honorable Sandra L. Townes
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Liga Restrepo Ramos*, Case No. 12 cr 672

Dear Judge Townes:

This firm represents Liga Restrepo Ramos ("Ramos") in connection with the above-referenced matter. We are writing to request an order (i) directing Pretrial Services to release Ms. Ramos's passports¹, and (ii) permitting Ms. Ramos to travel to Columbia for sixty (60) days to visit her terminally ill mother.²

Ms. Ramos entered a plea of guilty to one count of conspiracy to commit money laundering in violation of 18 U.S.C. §1956(h). Ms. Ramos subsequently cooperated with the government's investigation for years, and received an exemplary § 5K1.1 letter. On

¹It is our understanding that the government seized Ms. Ramos' U.S. and Colombian passports.

² If the Court believes necessary, upon her return, Ms. Ramos will surrender her passports to her supervising probation officer.

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August 7, 2015, Your Honor sentenced Ms. Ramos to probation for five years. During the first six months of her sentence, Ms. Ramos was subject to a curfew via electronic monitoring. In addition, Ms. Ramos agreed to a forfeiture amount of \$300,000 ("Forfeiture Order"). Ms. Ramos has completed the curfew period of her sentence, and has paid \$100,000 toward the Forfeiture Order.³ Notably, now that Ms. Ramos has satisfied the curfew period of her sentence, she is no longer subject to any specific travel restrictions.

As Your Honor may recall, Ms. Ramos is 57 years old. Ms. Ramos fled to the United States from Colombia with her three children and raised them by herself. To her credit, Ms. Ramos's children are college graduates and are gainfully employed. Ms. Ramos currently resides in Florida with her daughter Michelle Hernandez, and near her son Carlos Hernandez. Ms. Ramos is gainfully employed. Ms. Ramos is under the supervision of Probation Officer Harold Iglesias in the Southern District of Florida. I am informed that, to date, Ms. Ramos has satisfied all the conditions of her sentence without incident.

Ms. Ramos recently learned that her mother is near the end of her life. Ms. Ramos' mother is 82 years old and is suffering from a myriad of health issues, including severe Arterial Hypertension, Arteriosclerosis, Chronic Kidney disease (she only has one kidney left), hypothyroidism, chronic osteoporosis, hypoacusis, and chronic gastritis. Ms. Ramos' mother also suffered from gallbladder cancer in the past. On behalf of Ms. Ramos, we write this letter to Your Honor with the hope that Ms. Ramos will be permitted to visit with her mother during this period of extreme illness. Ms. Ramos's mother resides in Cali, Colombia. Ms. Ramos proposes to travel to Colombia for sixty (60) days. She proposes to travel via Miami International Airport and will return from Palmira Valle airport in Colombia. Ms. Ramos intends to stay in her mother's home during her visit.

Courts have broad authority to impose conditions on, and modify the scope of, the term of probation. *See e.g.* 18 U.S.C. § 3563(c) ("The court may modify, reduce, or enlarge the conditions of a sentence of probation at any time prior to the expiration or termination of the term of probation[.]") With respect to travel restrictions, however, such conditions on probation must be reasonably related to the defendant's rehabilitation and to the

³ As discussed during the sentencing hearing, Ms. Ramos agreed to pay the balance of the Forfeiture Order once her properties in Colombia were sold. It is our understanding that, to date, one property has been sold. Ms. Ramos' visit to Colombia may result in the sale of one or more additional properties. We have been in discussion with the government regarding additional payment towards the Forfeiture Order, and Ms. Ramos is prepared to make another payment once we reach agreement with the government.

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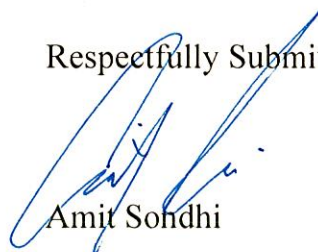
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protection of the public. *See U.S. v. Porotsky*, 105 F.3d 69 (2nd Cir. 1997) (abuse of discretion to deny defendant's request to travel to Russia for business during his probation period where the government provided no legitimate reason for the denial). "[T]he relevant question is only whether both the defendant's rehabilitation and the public interest would be served by preventing [the defendant] from travelling." *Id.* at 72.

We respectfully submit that restricting Ms. Ramos from traveling to Colombia would not further her rehabilitation or protect the public. Ms. Ramos's cooperation with the government's investigation, exemplary post-conviction record, and dedication to her children underscores that she is committed to rehabilitation and does not present a danger to the public. Further, Ms. Ramos is not a flight risk. Ms. Ramos has established roots in Florida, where her daughter Michelle Hernandez and son Carlos Hernandez both reside. Stated simply, Ms. Ramos is a dedicated mother and daughter whose only interest is to be with her mother before she dies and then return to Florida to be with her children.

I contacted AUSA Brendan King and Officer Iglesias concerning the request for return of Ms. Ramos' passports. Ultimately, Pre-Trial services in the Eastern District of New York requested that we file this motion.

Respectfully Submitted,



Amit Sondhi

cc: By Email

AUSA Brendan King, Esq.

Officer Harold Iglesias, Probation, Southern District of Florida

Denise Summers, Pre-Trial Services, Eastern District of New York